

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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PAN AMERICAN AIRWAYS, CORP.,

Plaintiff/counterdefendant,

v.

Civil Action No.  
04-CV-10515JLT

ROBERT E. BARNES,

Defendant/counterplaintiff.

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**Motion to Allow Withdrawal of Counsel**

Pursuant to Rule 7(b) of the Rules of Civil Procedure, and Rules 7.1 and 83.5.2(c), Plaintiff/counterdefendant Pan American Airways, Corp. ("Pan Am") hereby moves for leave of court to permit John R. Nadolny to withdraw as its counsel in this matter. In support of this motion, Pan Am states that Mr. Nadolny resigned his position with the company on June 3, 2005, and is no longer representing Pan Am in any capacity. Mr. Nadolny's Notice of Withdrawal is attached to this motion.

Pursuant to Rule 7.1(A)(2) of the Rules of this Court, counsel hereby certifies that he and counsel for defendant/counterplaintiff have conferred and counsel for defendant/counterplaintiff does not object to this motion.

**Dated: July 1, 2005**

Respectfully submitted,

A handwritten signature in black ink, appearing to read "RBC", written over a horizontal line.

Robert B. Culliford (BBO#638468)  
Pan American Airways, Corp.  
14 Aviation Avenue  
Portsmouth, NH 03801  
(603) 766-2002

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**PAN AMERICAN AIRWAYS CORP.**

**Plaintiff**

**v.**

**ROBERT E. BARNES**

**Defendant**

**Civil Action No. 04-10515-JLT**

**NOTICE OF WITHDRAWAL OF COUNSEL**

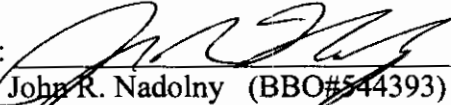
Now comes the undersigned, John R. Nadolny, and notifies this Court, with the assent of the Plaintiff herein, that he has withdrawn as counsel to the Plaintiff in this matter. This notice is tendered simultaneously with the appearance of successor counsel for the Plaintiff.

Dated: June 6, 2005

Respectfully submitted,

**PAN AMERICAN AIRWAYS CORP.**

By:

  
John R. Nadolny (BBO#544393)

14 Aviation Avenue

Portsmouth, NH 03801

Tel. (603) 766-2002